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8 **United States District Court**  
9 **District of Nevada**

10 United States of America,  
11 Plaintiff,  
12 v.  
13 Joseph Rosario Coppola,  
14 Defendant.

Case No. 2:99-cr-00217-APG-LRL-2

**Unopposed Motion to Unseal  
Documents**

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16 Defendant Joseph Rosario Coppola moves this Court to unseal documents  
17 that are necessary for undersigned counsel to fully review the record for appeal to  
18 the Ninth Circuit. *United States v. Joseph Rosario Coppola*, 9th Cir. No. 23-3062.  
19 To conduct a thorough record review and provide effective assistance of appellate  
20 counsel to Mr. Coppola, undersigned counsel requests the Court order the Clerk's  
21 office to unseal the following documents:

- 22 • ECF 187: Addendum to Revocation Petition
- 23 • ECF 188: Second Addendum to Revocation Petition

24 "It is clear that the courts of this country recognize a general right to  
25 inspect and copy public records and documents, including judicial records and  
26 documents." *Ctr. for Auto Safety v. Chrysler Grp., L.L.C.*, 809 F.3d 1092, 1096

1 (9th Cir. 2016) (cleaned up). “[F]ilings under seal” can “interfere” with this right  
2 to “open, public access to judicial records and documents.” *United States v.*  
3 *Sleugh*, 896 F.3d 1007, 1012 (9th Cir. 2018) (collecting cases). To fully protect  
4 this right, courts must “start with a strong presumption in favor of access to  
5 court records.” *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th  
6 Cir. 2003). Filings central to a case can remain under seal only if a “compelling  
7 reason” supports such a determination. *See Sleugh*, 896 F.3d at 1013 (cleaned  
8 up).

9 A compelling reason does not exist here for the addenda to the revocation  
10 petition to remain sealed. The addenda are necessary for the appellate record.  
11 The addenda include the government’s allegations underlying this Court’s  
12 revocation decision, which is the judgment Mr. Coppola has appealed. *See* ECF  
13 219. Moreover, this Court has already unsealed the revocation petition, ECF  
14 152, making the addenda necessary to provide the complete context for this  
15 Court’s decision. *See Ctr. for Auto Safety*, 809 F.3d at 1096 (identifying the need  
16 for “a measure of accountability” as a justification for the presumption of access).  
17 And lastly, courts frequently grant such requests, typically finding no compelling  
18 reason to keep material sealed in this context. *See, e.g., United States v.*  
19 *Valenzuela-Ramos*, No. 04-cr-687-PHX-DGC, 2010 WL 1511559, at \*1 (D. Ariz.  
20 Apr. 15, 2010); *United States v. Bulltail*, No. 13-cr-32-BLG-SPW, 2020 WL  
21 3895754, at \*1 (D. Mont. July 10, 2020).

22 For these reasons, undersigned counsel requests that the Court order the  
23 Clerk’s office to unseal the addenda to the revocation petition. A proposed order  
24 is attached for the Court’s convenience.  
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1           The undersigned has contacted counsel for the government, Assistant  
2 United States Attorney Melanee Smith, and the government does not oppose this  
3 motion.

4           **Dated:** January 23, 2024

5                               Respectfully submitted,  
6                               RENE L. VALLADARES  
7                               Federal Public Defender

8                               By: s/ Rohit Rajan

9                               Rohit Rajan  
10                              Assistant Federal Public Defender  
11                              Attorney for Joseph Rosario Coppola  
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1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 United States of America,  
4 Plaintiff,  
5

6 v.

7 Joseph Rosario Coppola,  
8 Defendant.

Case No. 2:99-cr-00217-APG-LRL-2

**Order Unsealing Documents**

9  
10 IT IS HEREBY ORDERED that the Clerk's Office is directed to unseal the  
11 addendum to the revocation petition (ECF 187) and the second addendum to the  
12 revocation petition (ECF 188).

13 **Dated:** January 24, 2024.

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15 U.S. DISTRICT COURT JUDGE  
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